# **United States District Court**

SOUTHERN			DISTRICT OF			TEXAS		
		Mo	CALLEN DIVISI	on —				
UNITED STATES O	F AMERI	ICA			CR	IMINAL	_ COMI	PLAINT
V. Robert Joseph Cielaki	<b>6</b>		PRINCIPAL			<b></b>		Number:
Ct. 1	YOB:	1974	United S	itates				00236 -M
Luis Ernesto Ramirez-	Mejia		CO-PRINCIPAL		United State	c Courte Sout		00200
Ct. 1, Ct. 2	YOB:	1987	Mexico			ct of Texas	.nem	
Silverio Moreno-Calde Ct. 1, Ct. 2	ron YOB:	1994	CO-PRINCIPAL Mexico			FILED		
-	TOB.	1334	MEXICO		2/	3/2022		
(Name and Address of Defendant)					Nathan Ochs	ner, Clerk of	Court	
I, the undersigned comp	plainant b	eing duly	sworn state the follow	ing is tru	e and corre	ct to the be	st of my	
knowledge and belief. C	n or abou	at	February 2, 202	<u>2</u> in		Hidalgo	_ Cou	nty, in
the Southe (Track Statutory Langue			District of	Texas		defen	dants(s) d	id,
Ct. 2 knowing or in re-	ckless dis	sregara o	I the fact that Migue	1 20y -12				4 a d 4 h a
along with twenty-thr United States in violat or shield from detection	ee (23) ot tion of lav on such a	ther undo w, concea diens in a	cumented aliens, for led, harbored or shie	a total o lded fro	of twenty-fo m detection	n or attem	pted to co	nceal, harbor,
along with twenty-thr United States in violat or shield from detection residence located in M	ee (23) ot tion of lav on such a lission, T	ther undo w, concea diens in a 'exas,	cumented aliens, for led, harbored or shie ny place, including a	a total o lded fro ny build	of twenty-form detection ing or mea	n or attem ns of trans	pted to co sportation	nceal, harbor, , to wit; a
along with twenty-thr United States in violat or shield from detection residence located in Minimum violation of Title I further state that I a	ee (23) ot tion of lay on such a lission, T	ther undo w, concea diens in a exas, United	cumented aliens, for led, harbored or shie ny place, including a States Code, Section(s	a total olded fron build	of twenty-form detection ling or mea 324(a)(1)(A)(	n or attem ns of trans ii),1324(a)(1	pted to co sportation ()(A)(iii) &	nceal, harbor, , to wit; a  324(a)(1)(A)(v)(l
along with twenty-thr United States in violat or shield from detection residence located in Main violation of Title	ee (23) of tion of lav on such a lission, T 8 m a(n) der Patrol A (TL). Agen rt Joseph C reno-Calde s and were ses from c Moreno-Ca delakie and Pathfinder.	ther undo w, concea diens in a exas,  United U.S. Bor  Agents we ints observe cielakie) ex eron) exite e observed one side to alderon wa Moreno-C	scumented aliens, for aled, harbored or shie my place, including a States Code, Section(states Code, Section(states Patrol Agent are conducting surveillanted a black Nissan Pathfirst the black Pathfinder. If the TL and approach to opening the back passe the other.  The sobserved going inside Calderon were observed	a total or lded from build had been deriver nger door the apart talking to	of twenty-form detection ing or mea 324(a)(1)(A)(4)(b) this complete is idence locate at the TL. At later a male near the blars and rear detection the three so the three s	ii),1324(a)(1 aint is bas ted in Missic agents obse subject we ck Pathfinds oor. Both su	pted to co sportation I)(A)(iii) & ' ed on the on, Texas, hand rived a whith aring a blace er. Both sub- ubjects wer outside with ore the two	nceal, harbor, , to wit; a  1324(a)(1)(A)(v)(l)  herein referred e older male ek sweater (later epiects were seen e also seen  h two females females and the
along with twenty-thr United States in violat or shield from detection residence located in Months in violation of Title I further state that I a following facts: February On MONTO 2, 2022, Bord to as the Target Location (later identified as Rober identified as Silverio Months talking for a few minutes moving boxes and suitca  Moments later, Silverio I and one male subject. Ci male entered the black for	ee (23) of tion of lav on such a lission, T 8 m a(n) der Patrol A (TL). Agen rt Joseph C reno-Caldes s and were ses from c Moreno-Ca delakie and Pathfinder.	ther undow, conceauliens in a lexas,  United U.S. Bor  Agents we not observed one side to alderon wall Moreno-C. Cielakie a and made	scumented aliens, for aled, harbored or shie my place, including at States Code, Section(states Patrol Agent are conducting surveillanted a black Nissan Pathfirst the black Pathfinder. It does not be the other.  The sobserved going inside Calderon were observed and Moreno-Calderon were a part of this complainted.	a total of lded from build  ) 13 and that ce of a render arrive Moments the driver anger door the apart talking to the also series also series.	of twenty-form detection ing or mea 324(a)(1)(A)(4)(b) this complete is idence locate at the TL. At later a male near the blars and rear detection the three so the three s	ii),1324(a)(1 aint is bas ted in Missic agents obse subject we ck Pathfinds oor. Both su	pted to co sportation I)(A)(iii) & ' ed on the on, Texas, hand rived a whith aring a blace er. Both sub- ubjects wer outside with ore the two	nceal, harbor, , to wit; a  1324(a)(1)(A)(v)(l)  herein referred e older male ek sweater (later epiects were seen e also seen  h two females females and the
along with twenty-thr United States in violat or shield from detection residence located in Monitoria in violation of Title I further state that I at following facts: February On MANAN 2, 2022, Bord to as the Target Location (later identified as Rober identified as Silverio Monitalking for a few minutes moving boxes and suitca  Moments later, Silverio I and one male subject. Ci male entered the black I subjects in the black Pati	ee (23) of tion of lav on such a lission, T 8 m a(n) der Patrol A (TL). Agen rt Joseph C reno-Caldes s and were ses from c Moreno-Ca delakie and Pathfinder.	ther undow, conceauliens in a lexas,  United U.S. Bor  Agents we not observed one side to alderon wall Moreno-C. Cielakie a and made	scumented aliens, for aled, harbored or shie my place, including at States Code, Section(states Patrol Agent are conducting surveillanted a black Nissan Pathfirst the black Pathfinder. It does not be the other.  The sobserved going inside Calderon were observed and Moreno-Calderon were a part of this complainted.	a total of lded from y build a that a	of twenty-form detection ing or mea 324(a)(1)(A)(this completes in the TL. A is later a male near the black and rear detection the three seen putting in the seen putt	n or attem ns of trans ii),1324(a)(1 aint is bas ted in Missic agents obse subject we ck Pathfinde oor. Both su bipects befo bags and a v	pted to co sportation I)(A)(iii) & ' ed on the on, Texas, hand rived a whith aring a blace er. Both sub- ubjects wer outside with ore the two	nceal, harbor, , to wit; a  1324(a)(1)(A)(v)(l)  herein referred e older male ek sweater (later epiects were seen e also seen  h two females females and the
along with twenty-thr United States in violat or shield from detection residence located in Monitoria in violation of Title I further state that I at following facts: February On MANAN 2, 2022, Bord to as the Target Location (later identified as Rober identified as Silverio Monitalking for a few minutes moving boxes and suitca  Moments later, Silverio I and one male subject. Ci male entered the black I subjects in the black Pati	ee (23) of tion of lav on such a lission, T 8 m a(n) der Patrol A (TL). Agen rt Joseph C reno-Caldes s and were ses from c Moreno-Ca delakie and Pathfinder.	ther undow, conceauliens in a lexas,  United U.S. Bor  Agents we not observed one side to alderon wall Moreno-C. Cielakie a and made	scumented aliens, for aled, harbored or shie my place, including at States Code, Section(states Patrol Agent are conducting surveillanted a black Nissan Pathfirst the black Pathfinder. It does not be the other.  The sobserved going inside Calderon were observed and Moreno-Calderon were a part of this complainted.	a total of lded from build had build had been deriver nger door the apart talking to be a lso so the also so the a	of twenty-form detection ing or meases and content and	ii),1324(a)(1 aint is bas ted in Missic agents obse subject we ck Pathfinde oor. Both su boming back bubjects befor bags and a v	pted to co sportation I)(A)(iii) & ' ed on the on, Texas, hand rived a whith aring a blace er. Both sub- ubjects wer outside with ore the two	nceal, harbor, , to wit; a  1324(a)(1)(A)(v)(l)  herein referred e older male ek sweater (later epiects were seen e also seen  h two females females and the
along with twenty-thr United States in violat or shield from detection residence located in Monitoria in violation of Title I further state that I at following facts: February On MANAN 2, 2022, Bord to as the Target Location (later identified as Rober identified as Silverio Monitalking for a few minutes moving boxes and suitca  Moments later, Silverio I and one male subject. Ci male entered the black I subjects in the black Pati	ee (23) of tion of law on such a lission, T 8 m a(n) der Patrol (17L). Agent Joseph Creno-Caldes and were esses from common control of the lake and Pathfinder. Hed sheet a led by Allectronic (1886) of the lake and by Allec	ther undow, conceauliens in a lexas,  United Sussemble U.S. Bor  Agents wents observed in the conserved one side to alderon wall Moreno-C. Cielakie a made JSA A. Comeans, sw	scumented aliens, for aled, harbored or shie my place, including a States Code, Section(states Patrol Agent are conducting surveillanted a black Nissan Pathfirst the black Pathfinder. It does not be a section opening the back passe the other.  The sobserved going inside Calderon were observed and Moreno-Calderon were a part of this complainted that are a section of the complainted castro	a total of lded from y build a that a	of twenty-form detection detection ing or mea 324(a)(1)(A)(this complete is idence locate at the TL. At later a male near the blars and rear detection the three seen putting later a material and contact the contact and con	ii),1324(a)(1 aint is bas ted in Missic Agents obse subject we ck Pathfinde oor. Both su bipects befo bags and a v  No salmon implainant imon	pted to co sportation  I)(A)(iii) & ded on the  on, Texas, he  rved a white aring a blace. Both subjects were  outside with ore the two white quilt of	nceal, harbor, , to wit; a  1324(a)(1)(A)(v)(l)  herein referred e older male ek sweater (later epiects were seen e also seen  h two females females and the
along with twenty-thr United States in violat or shield from detection residence located in Months in violation of Title I further state that I are following facts: February On MANNO 2, 2022, Bord to as the Target Location (later identified as Rober identified as Silverio Months as Silverio Months and one male subject. Cimale entered the black for subjects in the black Patients Continued on the attach Complaint Authorized  Submitted by reliable etelephonically per Fed.	ee (23) of tion of law on such a lission, T 8 m a(n) der Patrol (17L). Agent Joseph Creno-Caldes and were esses from common control of the lake and Pathfinder. Hed sheet a led by Allectronic (1886) of the lake and by Allec	ther undow, conceandliens in a lexas,  United Survey of the least observed one side to alderon was alleron was all	scumented aliens, for aled, harbored or shie my place, including a States Code, Section(states Patrol Agent are conducting surveillanted a black Nissan Pathfirst the black Pathfinder. It does not be a section opening the back passe the other.  The sobserved going inside Calderon were observed and Moreno-Calderon were a part of this complainted that are a section of the complainted castro	a total of lded from y build lded from y build lded from y build lded from y build lded lded lded lded lded lded lded l	of twenty-form detection ing or mea  324(a)(1)(A)(this compliants and rear detection in the state and rear detection in the three state and rear detection in the state and rear detection in	ii),1324(a)(1 aint is bas ted in Missic Agents obse subject we ck Pathfinde oor. Both su  oming back ubjects befor bags and a v  No  salmon mplainant imon if Complainar cas	pted to co sportation  I)(A)(iii) & ded on the  on, Texas, he  rved a white aring a blace. Both subjects were  outside with ore the two white quilt of	nceal, harbor, , to wit; a  1324(a)(1)(A)(v)(i)  herein referred e older male ek sweater (later ojects were seen e also seen  th two females females and the on top of the
along with twenty-thr United States in violat or shield from detection residence located in Months in violation of Title I further state that I are following facts: February On MANNO 2, 2022, Bord to as the Target Location (later identified as Rober identified as Silverio Months as Silverio Months and one male subject. Cimale entered the black for subjects in the black Patients Continued on the attach Complaint Authorized  Submitted by reliable etelephonically per Fed.	ee (23) of tion of lav on such a lission, T 8 am a(n) der Patrol A (TL). Agen of (TL). Agen of t Joseph C reno-Caldes s and were ses from of Moreno-Ca delakie and Pathfinder. hed sheet a ed by AL	ther undow, conceandliens in a lexas,  United Survey of the least observed one side to alderon was alleron was all	scumented aliens, for aled, harbored or shie my place, including a States Code, Section(states Patrol Agent are conducting surveillanted a black Nissan Pathfirst the black Pathfinder. It does not be a section opening the back passe the other.  The sobserved going inside Calderon were observed and Moreno-Calderon were a part of this complainted that are a section of the complainted castro	a total of lded from y build lded from y build lded from y build lded from y build lded lded lded lded lded lded lded l	of twenty-form detection detection ing or mea 324(a)(1)(A)(this complisation of the TL. As later a male near the blars and rear detection the three seen putting later a male ignature of Cochristian Sal rinted Name of the three of thre	ii),1324(a)(1 aint is bas ted in Missic Agents obse subject we ck Pathfinde oor. Both su  oming back ubjects befor bags and a v  No  salmon mplainant imon if Complainar cas	pted to co sportation  I)(A)(iii) & ded on the  on, Texas, he  rved a white aring a blace. Both subjects were  outside with ore the two white quilt of	nceal, harbor, , to wit; a  1324(a)(1)(A)(v)(i)  herein referred e older male ek sweater (later ojects were seen e also seen  th two females females and the on top of the
along with twenty-thr United States in violat or shield from detection residence located in Min violation of Title I further state that I a following facts: February On Invary 2, 2022, Bord to as the Target Location (later identified as Rober identified as Silverio Montalking for a few minutes moving boxes and suitca  Moments later, Silverio I and one male subject. Ci male entered the black Pati  Continued on the attach Complaint Authorize  Submitted by reliable etelephonically per Fed.  February 3, 2022	ee (23) of tion of lav on such a lission, T 8 am a(n) der Patrol A (TL). Agen of (TL). Agen of t Joseph C reno-Caldes s and were ses from of Moreno-Ca delakie and Pathfinder. hed sheet a ed by AL	ther undow, conceandliens in a vexas,  United to U.S. Bor  Agents we not observed one side to alderon was alleron	scumented aliens, for aled, harbored or shie my place, including a States Code, Section(states Patrol Agent are conducting surveillanted a black Nissan Pathfirst the black Pathfinder. It does not be a section opening the back passe the other.  The sobserved going inside Calderon were observed and Moreno-Calderon were a part of this complainted that are a section of the complainted castro	a total of lided from y build a that that the ce of a render arrive Moments the driver anger door the apart talking to the also series als	of twenty-form detection ing or mea  324(a)(1)(A)(this compliants and rear detection in the state and rear detection in the three state and rear detection in the state and rear detection in	ii),1324(a)(1 aint is bas ted in Missic Agents obse subject we ck Pathfinde oor. Both su  ming back pags and a v  No  salmon mplainant mon f Complainar  kas	pted to co sportation  (i)(A)(iii) & ded on the con, Texas, he red a white aring a blacer. Both subjects were coutside with the the two white quilt of the two white quilt of the two descriptions.  Border at	nceal, harbor, , to wit; a  1324(a)(1)(A)(v)(i)  herein referred e older male ek sweater (later ojects were seen e also seen  th two females females and the on top of the

Case 7:22-mj-00236 Document 1 Filed on 02/04/22 in TXSD Page 2 of 4 UNITED STATES DISTRICT COURT

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS McALLEN, TEXAS

## ATTACHMENT TO CRIMINAL COMPLAINT:

M-22-00236 -M

**RE:** Robert Joseph Cielakie

Luis Ernesto Ramirez-Mejia Silverio Moreno-Calderon

#### **CONTINUATION:**

While both subjects were going back and forth trying to conceal the subjects an additional male (later identified as Luis Ernesto Ramirez-Mejia) approached the Pathfinder and was observing how they were concealing the two females and the male. Ramirez-Mejia was also observed going towards the mailbox and retrieve some mail.

Agents then observed the black Pathfinder departing the TL. Agents contacted Hidalgo County Sheriff's Office (HCSO) and requested assistance with the investigation. HCSO Deputy observed the black Pathfinder on Conway and Frontage Rd. in Mission, Texas. HCSO Deputy conducted a traffic stop for a Failure to stop at designated point. Agents approached the driver and identified themselves and ask him if he was alone in the vehicle. The driver stated that he had three subjects hiding in the back of the Pathfinder. Agents then were able to observe one female hiding inside a blue bin that was covered with a white quilt. The other female was hiding in the cargo area. One male subject was hiding behind the driver and passenger seat. After an immigration inspection the driver was determined to be a United States citizen. The three subjects hiding in the black Pathfinder were determined to be illegally present in the United States.

Once at the TL Agents and Deputies conducted a knock and talk. A male subject opened the door from the inside. Agents and Deputies observed multiple people from one bedroom across the front door and advised them to come out. A total of eight subjects freely exited the residence. All subjects were questioned as to their immigration status, and it was determined they were illegally present in the United States. Several subjects that exited the residence forgot their belongings inside. Agents escorted the subjects one by one inside to retrieve their belongings and observed fifteen more subjects inside another bedroom. All fifteen subjects were determined to be illegally present in the United States. Among these subjects, Silverio Moreno-Calderon and Luis Ernesto Ramirez-Mejia were encountered.

Three principals and two material witnesses were transported to the McAllen Border Patrol Station for case preparation and processing.

#### **PRINCIPAL STATEMENT: Robert Joseph Cielakie**

Robert Joseph Cielakie, a United States citizen, was read his Miranda rights in the English language. Cielakie understood his rights and agreed to provide a statement.

Cielakie stated he obtained a vehicle from an acquaintance in Houston, Texas with the intent to transport illegal aliens. Cielakie further stated he agreed to transport four illegal aliens and was to be paid \$1,500 to \$2,000 per person upon arrival to their destination but only picked up three. Cielakie admitted he has transported illegal aliens on four prior occasions and was given instructions as to pick up locations and methods on how to evade law enforcement detection.

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS McALLEN, TEXAS

### ATTACHMENT TO CRIMINAL COMPLAINT:

M-22- 00236 -M

RE: Robert Joseph Cielakie
Luis Ernesto Ramirez-Mejia
Silverio Moreno-Calderon

#### **CONTINUATION:**

Cielakie was presented a photo lineup and identified Luis Ernesto Ramirez-Mejia as the man in charge of the residence. On a separate photo lineup, Cielakie also identified Silverio Moreno-Calderon as the man who helped load illegal aliens into his vehicle.

#### PRINCIPAL STATEMENT: Luis Ernesto Ramirez-Mejia

Luis Ramirez-Mejia, a citizen and national of Mexico, was read his Miranda rights in the Spanish language. Ramirez-Mejia understood his rights and agreed to provide a statement.

Ramirez-Mejia freely admitted being illegally in the United States, and indicated he illegally crossed the Rio Grande River on December 22, 2021. Ramirez-Mejia stated he has been living at the residence where he was apprehended since the day he crossed. Ramirez-Mejia denied being in charge or being the caretaker. He stated he cooked for all the other illegal aliens at the residence.

Ramirez-Mejia identified Silverio Moreno-Calderon as the subject that helped him cook and went to buy food several times.

#### PRINCIPAL STATEMENT: Silverio Moreno-Calderon,

Silverio Moreno-Calderon, a citizen and national of Mexico, was read his Miranda rights in the Spanish language. Moreno understood his rights but was unwilling to provide a statement without the presence of an attorney.

### **MATERIAL WITNESS STATEMENT: Jose Maynor Ramirez-Trista**

Jose Maynor Ramirez-Trista, a citizen and national of Guatemala, was read his Miranda rights in the Spanish language. Ramirez-Trista understood his rights and agreed to provide a sworn statement.

Ramirez-Trista stated he has been living in Reynosa, Mexico for the last five years. He also stated his mother made the arrangements for him to be smuggled into the United States and was unaware of the cost for the arrangements. Ramirez-Trista stated last Sunday he crossed into the United States with several other subjects and was transported to the residence where he was apprehended. Ramirez-Trista stated a male subject instructed all the illegal aliens to put their cellphones in a box. He also stated the same subject gave everyone instructions on when they would eat.

Ramirez-Trista identified Robert Joseph Cielakie through a photo lineup, as the driver who transported him to the residence.

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS McALLEN, TEXAS

### ATTACHMENT TO CRIMINAL COMPLAINT:

M-22-00236 -M

RE: Robert Joseph Cielakie

Luis Ernesto Ramirez-Mejia Silverio Moreno-Calderon

#### **CONTINUATION:**

Ramirez-Trista identified Silverio Moreno-Calderon as one of the caretakers that instructed him to leave the residence and to get into the vehicle. Ramirez-Trista also indicated Silverio Moreno-Calderon would tell them when to eat and would allow them to go to the restroom.

#### MATERIAL WITNESS STATEMENT: Miguel Tzoy-Ixchop, Guatemala

Miguel Tzoy-Ixchop, a citizen and national of Guatemala, was read his Miranda rights in the Spanish language. Tzoy understood his rights and agreed to provide a sworn statement.

Tzoy told Agents he crossed the Rio Grande River with four other people, two being foot guides. Tzoy stated he made his own smuggling arrangements and paid \$12,000 to date. Tzoy claimed after being led through the brush to a road, he was transported to a house for a few hours and then to the apartment where he was arrested. Tzoy stated at the residence a male subject took his phone away and instructed him to enter a bedroom with the other nine people. Tzoy indicated this man was called "El Guero". Tzoy added this man would tell other people in the house that they needed more money for the trip. Tzoy stated another subject helped keep people inside the house and would assign chores in the residence. Tzoy stated this second subject was called "El Gordo".

Tzoy identified Silverio Moreno-Calderon, through a photo lineup, as "El Gordo" and one of the caretakers of the residence.

Tzoy identified Luis Ramirez-Mejia, through a photo lineup, as "El Guero" also one of the caretakers of the house.